

THE HONORABLE THOMAS S. ZILLY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON

HUNTERS CAPITAL, LLC, et al.,

Plaintiffs,

vs.

CITY OF SEATTLE,

Defendant.

Case No. 2:20-cv-00983-TSZ

DECLARATION OF JILL CRONAUER
IN SUPPORT OF PLAINTIFFS'
RESPONSE IN SUPPORT OF CITY OF
SEATTLE'S MOTION TO SEAL CERTAIN
EXHIBITS

Noted: October 14, 2022

I, Jill Cronauer, declare as follows:

1. I am a principal and Chief Operating Officer of Hunters Capital, LLC. I have over 15 years in real estate management and leasing. I am also involved in the management of Hunters Property Holdings LLC and Greenus Building, Inc. (collectively, these entities above are referred to herein as the "Hunters Capital Entities").

2. I understand that the City has filed some materials containing the Hunters Capital

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(Case No. 2:20-cv-00983-TSZ) - 1

MORGAN, LEWIS & BOCKIUS LLP
ATTORNEYS AT LAW
1301 SECOND AVENUE, SUITE 2800
SEATTLE, WASHINGTON 98101
TEL +1.206.274.6400 FAX +1.206.274.6401

1 Entities' confidential information under seal or with redactions, including an email with containing
2 leasing rate negotiations.

3 3. Ex. 10 is an email from me to the managers of Poquitos Restaurant dated September
4 24, 2021, well after CHOP was concluded, addressing the issue of Poquitos's renewal of a
5 commercial lease.

6 4. Ex. 10 noted that the lease was terminating soon and suggested a fair market rent
7 for the space.

8 5. Ex. 10 proposed a specific amount of rent rates for two separate spaces.

9 6. Ex. 10 also proposed a percentage increase and indicated an approximate amount
10 of rent abated.

11 7. The disclosure of this information contained in Ex. 10 could cause competitive
12 harm for Hunters Capital, because it lists the rent rates proposed by Hunters Capital and an
13 estimation of the fair market value of the lease.

14 I declare under the penalty of perjury under the laws of the United States of America and
15 the State of Washington that the foregoing is true and correct.

16 DATED this 10th day of October, 2022 at Seattle, Washington.

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